

N60201.AR.000970
NS MAYPORT
5090.3a

LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING DRAFT STATEMENT OF BASIS FOR AREA OF CONCERN C
BUILDING 191 NS MAYPORT FL
3/20/2009
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

March 20, 2009

Mr. Dana Hayworth, P.G.
Department of the Navy
Naval Facilities Engineering Command Southeast
Naval Air Station Jacksonville
Building 135
Post Office Box 30
Jacksonville, Florida 32212

**RE: Draft Statement of Basis, Area of Concern C – Building 191, Naval Station
Mayport, USEPA ID #FL9 170 024 260, Mayport, Florida, (Tetra Tech NUS,
Incorporated, June 29, 2007)**

Dear Mr. Hayworth:

I have reviewed the subject document dated June 29, 2007 (received June 28, 2007). My comments concerning this Statement of Basis (SB) are below.

General Comments

Use the SB for SWMU 23 as a guide of how each section should be written. That is the reference that I am following. Also, after reviewing the AOC C Corrective Measure Study, it is FDEP's opinion that compounds were left off of the COC list for groundwater, and possibly surface soil needs to include one or two as well. Please recheck the final COCs that were defined in this document. FDEP believes the compounds that should be included in the groundwater list are tetrachloroethene (PCE), 1,1-dichloroethene (1,1-DCE), vinyl chloride (VC), arsenic, iron, manganese, 1,4-dioxane, 2-methylnaphthalene, acenaphthene, carbazole, dibenzofuran, and naphthalene. All of these compounds were found in at least one monitoring well that exceeded the FDEP GCTL for that contaminant (aldrin can be dropped from the list due to its PQL being higher than the max concentration). The surface soil COC list may stay the same (currently no compounds in surface soil COC list). However, the BaP equivalents in the CMS were not calculated correctly. Half of the method detection limit should be used for a concentration when a contaminant is not detected. This may change the outcome of the calculation. Another point of question is the text in the CMS pointing out that the cancer risk (for the future resident) from exposure to benzo(a)pyrene (equivalent), Aroclor-1260, and arsenic in surface soil exceeds the 1.0×10^{-6} threshold. Did the soil excavation in 2006 remove these contaminants (this was not discussed in the CMS but it is mentioned in the SB)? My review of this SB will be conducted as if no soil, sediment, or surface water COCs were found. Only groundwater (GW) COCs apply.

1. **Title Block:** Please add the USEPA ID # (FL9 170 024 260) between the title and date.

2. **Summary, Page 1, Column 1:** Please remove the word "the" between "at" and "Naval" in the first sentence.
3. **Summary, Page 1, Column 1:** Please have the second sentence changed to the following sentences: "AOC C, Building 191, has been impacted by several compounds at low concentrations in groundwater within, and nearby, the boundary of AOC C that exceed their Florida Department of Environmental Protection (FDEP) Groundwater Cleanup Target Level (GCTL). The chemicals of concern (COCs) in groundwater at AOC C are... (see list above).
4. **Summary, Page 1, Column 1:** Please put sentence four, which begins with "LUCs will be," before sentence three, which begins with "Soil contamination is."
5. **Summary, Page 1, Column 1:** Please make new sentence three read: "Groundwater LUCs will be implemented at the site in the form of groundwater use restrictions."
6. **Summary, Page 1, Column 1:** Please use the first paragraph of Page 1, Column 2 in SWMU 23's statement of basis after sentence three. This paragraph starts out by saying: "LUCs for groundwater will prohibit groundwater use/extraction and will..."
7. **Summary, Page 1, Column 1:** Please use this sentence as the next sentence: "Yearly site inspections will be conducted by NAVSTA Mayport personnel to verify the LUCs are being maintained."
8. **Summary, Page 1, Column 1:** Please use this sentence as the last sentence of the Summary Paragraph: "No COCs were identified for soil, sediment, or surface water."
9. **Introduction, Page 1, Column 1:** Please change the first sentence of the second paragraph to read: "This Statement of Basis (SB) identifies the proposed corrective action for AOC C, explains why the selected corrective action was chosen, describes..."
10. **Proposed Corrective Action, Page 2, Column 1:** Please use paragraphs 2 and 3 in the SWMU 23 Proposed Corrective Action SB as a guide on how to write this section for AOC C. Only minor changes need to be made to these paragraphs so that they can then be incorporated into AOC C's SB. "MNA" should be used instead of "groundwater monitoring." Remove references to excavation in the third paragraph. Also, please use the estimated present worth costs language used in the SB for SWMU 23. Finally, move the sample location and contaminant concentration references to the Summary of Facility Risks section (the groundwater portion), although I'm not sure if we need the sample location concentration references now due to the extra contaminants being listed for GW COCs.
11. **Facility Background Page 2, Figure 2:** Please label AOC C more clearly in Figure 2 (please see Figure 2 in SWMU 23's SB).
12. **Facility Background Page 2, Column 2:** Please rewrite the last sentence in the Facility Background without referencing the partnering team. One version could be: "As a result, the boundaries of AOC C were revised to include only Building 191 and a small section of parking lot along its northern side."
13. **Summary of Facility Risks, Page 2, Column 2:** Please add the sentence "In addition, human health risks were considered further in the CMS." between the first and second sentence of the first paragraph.
14. **Summary of Facility Risks, Page 3, Column 1:** In the second paragraph the dimethoate argument is sound, however, per 62-780, you need hard data to show that this won't leach to groundwater. Please see the leachability criteria under Risk Management Option Level I for direction. One thing that could have been done was to run SPLP on this sample to verify this assumption. If this route is not an option, then this soil will need to be removed (dug out) or monitoring and LUCs will need to be put in place for soil.
15. **Summary of Facility Risks, Page 3, Column 1:** Please revise the third paragraph to show that several compounds did exceed their SCTLs for direct residential exposure and/or

leachability (review CMS). Then combine/follow these sentences up with the interim measures paragraph in column 2.

16. **Summary of Facility Risks, Page 3, Column 1:** Please revise the fourth paragraph (the GW section) to include all COCs. Also, please remove the fifth paragraph.
17. **Summary of Facility Risks, Page 3, Column 1:** Please revise the paragraph for surface water under the Ecological Risk Assessment. The revision could be: "...in surface water or sediment, which indicates that no adverse ecological risks exist for these media."
18. **Scope Of Corrective Action, Page 3, Column 2:** Please revise this section to include all of the COCs and new total volume of contamination.
19. **Scope Of Corrective Action, Page 3, Column 2:** Please revise Figure 3 (see comment 17).
20. **Summary of Alternatives, Page 3, Column 2:** Groundwater Alternative 2: MNA and LUCs: Please revise the first sentence to be what is contained in the GW Alternative 2 in the SB for SWMU 23. It starts with "This alternative would impose LUCs in the form of a groundwater use/extraction prohibition, and...sampling and analysis of downgradient wells will be implemented to assess COC attenuation in groundwater." This alternative should continue with "Once implemented, procedures would be set in place to ensure that the LUCs continue to be maintained via preparation of a site-specific CMIP as required by NAVSTA Mayport's RCRA permit." Please continue with "This implementation plan will provide...determine an alternative course(s) of action is necessary."
21. **Summary of Alternatives, Page 3, Column 2:** Groundwater Alternative 3: In-situ Bioremediation, LUCs, and Monitoring: Please revise the last sentence accordingly (where injections may take place and how much).
22. **Table 1, Page 4:** Please update the costs for Alternatives 2 and 3 in this table to conform to what will be presented in the Proposed Corrective Action Section.
23. **Recommendations, Page 5, Column 1:** Please use paragraphs 1 and 4 from the SWMU 23 SB in this section. Remove the soil references in the first paragraph, and in the fourth paragraph substitute MNA for groundwater monitoring.
24. **Public Participation, Page 5, Column 1:** Please change FDEP contact to John Winters. Also, change the Section that I work in to the "Federal Programs Section". This should be done on page 8 as well.

Thank you for the opportunity to review this document. If you require additional clarification or other assistance, please feel free to contact me at 850/245-8999.

Sincerely,



John Winters, P.G.
Remedial Project Manager

JJC  ESN 

cc Tim Bahr, FDEP, Tallahassee